

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re:

James Paul Casher

Debtor 1

Nylene M. Casher

Debtor 2

Wilmington Trust, National Association, not
in its individual capacity, but solely as Owner
Trustee of OSAT Trust 2021-1

Movant(s)

v.

James Paul Casher

Nylene M. Casher

Respondent(s)

Jack N. Zaharopoulos, Esquire

Standing Chapter 13 Trustee

Additional Respondent

Chapter 13

Case No. 4:22-BK-01601-MJC

Matter: Motion for Relief from the
Automatic Stay

Document No. 35

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), James Paul Casher and Nylene M. Casher, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Admitted.
3. Admitted
4. Upon information and belief, the averment as stated in Paragraph 4 is admitted.
5. Denied. Debtor(s) are without sufficient knowledge as to the truth of the information as set forth in Paragraph 5; therefore, it is denied.

6. Upon information and belief, the averment as stated in Paragraph 6 is admitted. By way of further response, Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.

7. Upon information and belief, the averment as stated in Paragraph 7 is admitted. By way of further response, Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.

8. Paragraph 8 contains a conclusion of law to which no response is required.

9. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 9; therefore, it is denied. By way of further response, as of the date of this filing, Debtor(s) are not delinquent in their payments to the Standing Chapter 13 Trustee.

10. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 10; therefore, it is denied.

11. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 11; therefore, it is denied.

12. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 12; therefore, it is denied.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: March 3, 2025

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
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Attorney for Debtor(s)

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CERTIFICATE OF SERVICE

I hereby certify that on Monday, March 3, 2025, I served a true and correct copy of the **Debtor(s)**'
Answer to Movant(s)' Motion for Relief from the Automatic Stay in this proceeding via
electronic means upon the following:

Brent Lemon, Esquire
KML Law Group
701 Market Street, Suite 5000
Philadelphia, PA 19106
Counsel for Movant(s)

Jack N. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee
Sylvia H. Rambo United States Courthouse
1501 North Sixth Street, Floor 3
Harrisburg, PA 17102

/s/ Kathryn S. Greene

Kathryn S. Greene, M-Jur., RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire